

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 21-CR-108 (2) (PAM/TNL)

UNITED STATES OF AMERICA,)
)
)
 Plaintiff,)
vs.)
)
 MOTION FOR EARLY DISCLOSURE
TOU THAO,)
)
 Defendant.)
)
)

The Defendant, Mr. Tou Thao, by and through his attorneys, Robert Paule and Natalie R. Paule, respectfully moves this Court for an order requiring the Government to provide early disclosure of Jencks Act materials pursuant to 18 U.S.C. §3500. Specifically, Mr. Thao respectfully request the materials be disclosed thirty (30) days prior to trial. This disclosure includes, but is not limited to, any recorded statements, report of a government witness, any written statement by a government witness, any substantially verbatim transcripts, and any grand jury transcripts.

Respectfully submitted,

Dated: This 3rd day of August, 2021

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